

**STATE OF NEW HAMPSHIRE  
DEPARTMENT OF ENVIRONMENTAL SERVICES  
WATER COUNCIL**

**IN RE: ROBERT CHAPMAN and CHAPMAN SCRAP METAL RECYCLING**

**DOCKET NO. 04-22-WC**

**ASSENTED-TO MOTION TO CONTINUE PRE-HEARING CONFERENCE**

NOW COME ROBERT CHAPMAN and CHAPMAN SCRAP METAL RECYCLING  
of Milan, New Hampshire, and move as follows:

1. The Water Council has scheduled a pre-hearing conference in this case on April 4, 2005.
2. The parties continue to work together to resolve this matter and have made significant progress.
3. Additional time is needed to continue to pursue the considerable efforts that have been made to date.
4. The efficient administration of justice is best served by allowing full exploration of resolution without the need of a hearing.
5. Counsel for the State is required to be out-of-state in connection with a litigated matter during the week of April 4, 2005 and is unable to attend the pre-hearing conference as currently scheduled.
5. A continuance of the pre-hearing conference for a period of thirty (30) days, or to the next available date thereafter, is requested. Opposing counsel consents to this Motion.

WHEREFORE, Robert Chapman and Chapman Scrap Metal Recycling respectfully request that the pre-hearing conference scheduled for April 4, 2005 be continued for thirty (30)

days to allow full exploration and discussion of resolution of the matter as well as to allow adequate preparation for the pre-hearing conference if the matter is not resolved.

Respectfully submitted,

Robert Chapman and Chapman Scrap Metal Recycling

By Its Attorneys,

MCLANE, GRAF, BAULERSON & MIDDLETON,  
PROFESSIONAL ASSOCIATION

By: \_\_\_\_\_

**COPY**  
Gregory H. Smith  
Bicentennial Square  
15 North Main Street  
Concord, NH 03301-4945  
603-226-0400

**Certificate of Service**

I hereby certify that on March 28, 2005, I served the foregoing Motion by hand-delivering a copy to Allen Brooks, Esq. at the NH Dep't of Justice, Environmental Protection Bureau, 33 Capitol Street, Concord, NH 03301, to Michael B. Nolin, Commissioner and Harry T. Stewart, Director Water Division.

**COPY**  
Gregory H. Smith